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USDS SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: 11/14/19  
JASON D. WRIGHT

ADMITTED IN NEW YORK, VIRGINIA  
AND THE DISTRICT OF COLUMBIA  
OF COUNSEL

November 13, 2019

The Honorable Kimba M. Wood  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

MEMO ENDORSED

*Re: United States v. Jacqueline Tsai  
Criminal Docket No. 17-198 (KMW)*

Dear Judge Wood:

On behalf of Jacqueline Tsai in the above-referenced case, I submit this letter as an application that the date for her surrender to begin serving her custodial sentence be extended from November 15, 2019, to January 6, 2020.

Since sentencing, Ms. Tsai has been attempting to secure daycare for her two year-old daughter. Ms. Tsai has not yet been able to secure a place for her daughter in part because the child is not potty-trained. Meanwhile, Ms. Tsai has been on a wait list for an appointment to meet with the Riverside County (California) Department of Education which can help her find a daycare facility and was advised this past week that the agency can meet with Ms. Tsai on November 21, 2019, with an eye toward a program for the child to begin in early January. Meanwhile Ms. Tsai believes that the intervening weeks between November 15 and January 6 will afford her a reasonable chance at accomplishing the child's training before the expected starting date for the daycare.

The government advises me that it opposes this application because of a claim of new criminal conduct by Ms. Tsai. I have not an opportunity to discuss that claim with Ms. Tsai so am I unable to shed light on it other than to note that it is separate from the interests of the child, permitting her interests and those of the government both to be served by extension of surrender as requested. For these reasons, I respectfully request that Ms. Tsai's surrender be extended from November 15, 2019, to January 6, 2020.

Respectfully,

/s/

Andrew J. Frisch *Denied* *11-14-19*  
SO ORDERED: N.Y., N.Y.

cc: AUSA Christine Magdo